

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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Leonard F. Joy
Executive Director

August 15, 2007

*Southern District of New York
John J. Byrnes
Attorney-in-Charge*

By Hand & ECF

Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Angela Huang, et al.
06 Cr. 1006 (KMK)

Dear Judge Karas,

With the gracious consent of the government, I write on behalf of my client, Bouhari Adoyi, to request a second extension of the scheduled deadline for the filing of the defendant's reply in the above-captioned case. Pursuant to Your Honor's order of August 7, 2007, Mr. Adoyi was to file his reply by Friday, August 17, 2007. Defendant's reply was to be filed today, August 3, 2007. We ask to be allowed to file our reply no later than August 27, 2007.

I am sorry to be making a second request for an extension. My prediction that an adequate reply could be prepared by August 17, 2007 was, in retrospect, unrealistic. Given the number of competing demands associated with my impending departure from the Federal Defenders of New York, relocation to New Orleans, Louisiana, and assumption of duties at the Orleans Public Defenders, completion of a meaningful reply by the 17th is simply not possible. I apologize for the inaccuracy of my earlier prediction, and will not request another extension beyond the 27th.

I have discussed this matter with AUSA Steve Lee, whose understanding, patience, and professional courtesy has been commendable and is deeply appreciated. On behalf of the government, he consents to an extension of the filing date to August 27, 2007.

I may be reached at (212) 417-8761 if more information is required.

Respectfully submitted,



Christopher A. Flood
Counsel for Bouhari Adoyi

CC: Steve Lee
Assistant United States Attorney